

**EX PARTE**

April 27, 2006

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Ex Parte Meeting  
VSNL Telecommunications (US) Inc. – RM No. 11312  
Reporting Requirements of U.S. Providers of International  
Telecommunications Services – IB Docket No. 04-112**

Dear Ms. Dortch:

On March 26, 2006, Adam Kupetsky, Regulatory Counsel for Level 3 Communications, LLC ("Level 3"), Mike Saunders from Level 3 and Kent Bressie of the law firm Harris, Wiltshire and Grannis LLP met with John Guisti, Howard Griboff, Cathy Hsu and Sean O'More from the Federal Communications Commission's International Bureau and, during the meeting, discussed issues that are raised in the proceedings referenced above. With respect to RM No. 11312, Level 3 reiterated the arguments that it made in the Comments and Reply Comments it submitted in this docket and urged the Commission to issue a Notice of Proposed Rulemaking as soon as possible. With respect to IB Docket No. 04-112, Level 3 reiterated and supported the arguments made by AT&T and MCI urging the Commission to eliminate the international reporting requirements set forth in Sections 43.61 and 43.82 of the Commission's rules. Level 3 further explained that extending the 43.82 reporting requirement to non-common carriers would be an unnecessarily regulatory solution to a disparity that should be resolved by rationalizing and simplifying the regulatory fee requirements imposed on all international capacity providers.

Pursuant to the Commission's rules, one copy of this memorandum is being filed electronically in the docket referenced above for inclusion in the public record. Please do not hesitate to contact me at 918 547 2764 if you have any questions.

Respectfully submitted,

/s/ Adam Kupetsky

Adam Kupetsky  
Regulatory Counsel  
Level 3 Communications, LLC

cc (via electronic mail): John Giusti  
Howard Griboff  
Sean O'More  
Cathy Hsu